

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

DR. AMY R. WOODS PLAINTIFF

VS CIVIL ACTION NO. 3:19-CV-00234-NBB-RP

MHM HEALTH PROFESSIONALS, LLC, D/B/A
CENTURION PROFESSIONALS;
MANAGEMENT & TRAINING CORPORATION
JESSE WILLIAMS, INDIVIDUALLY;
AND JOHN DOES 1-9 DEFENDANTS

ZOOM DEPOSITION OF APRIL MEGGS

Taken at the Instance of the Plaintiff
with All Parties Appearing by Zoom Videoconferencing
On August 5, 2020
At 12:32 p.m.

REPORTED BY: SHARRON F. ALLEN, CSR, RPR
CSR NO. 1144

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ALSO PRESENT: DR. AMY WOODS

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1 APRIL MEGGS,
2 having first been duly sworn, was examined and
3 testified as follows:
4 EXAMINATION
5 BY MR. WAIDE:
6 Q. would you state your name, please,
7 ma'am.
8 A. My name is April Lynette Meggs.
9 Q. Ms. Meggs, physically where are you
10 right now?
11 A. I'm in my regional office in Jackson,
12 Mississippi.
13 Q. Is anybody there with you?
14 A. No, sir.
15 Q. You're in the room by yourself?
16 A. Yes, sir.
17 Q. Ms. Meggs, my reception is probably bad
18 on this computer and I'm not seeing you, but it
19 looks like -- do you have -- do you have a mask
20 on?
21 A. No, I don't. I mean, all --
22 Q. I just can't see you.
23 A. I don't know how to fix it, but, yeah,
24 this is all I have.
25 Q. Okay. I'm sorry. I just couldn't -- I

1 Professionals?
2 A. I'm the vice president of operations.
3 Q. Did you know Dr. Amy Woods when she was
4 there?
5 A. Yes, sir.
6 Q. Did you -- of course, you weren't
7 on-site, so you wouldn't have any opportunity to
8 observe her work, I would assume. Am I right or
9 wrong?
10 A. You're correct.
11 Q. In your capacity as director of
12 operations, are you over the medical staff up at
13 the Marshall County Correctional Facility?
14 A. Yes, sir, I'm over the staff in the
15 state in conjunction with clinical leadership
16 from Dr. Clayton Ramsue.
17 Q. All right. Dr. Ramsue -- you say in
18 conjunction with him. Y'all are both over the
19 medical staff, basically?
20 A. Yeah. Actually, the doctors are --
21 they report to him; he's their direct
22 supervisor. And if anything goes any further, I
23 mean, I'm over operations if there's a problem.
24 Q. Is there anything in the policies or
25 procedures of your company that requires that

1 see you -- when you moved up, I could see your
2 face.
3 So is Jackson, Mississippi, your
4 regular office? Is that where you have your
5 office?
6 A. Yes. It's 111 East Capitol Street.
7 Q. Who has -- what other employees of MHM
8 Health Professionals have offices there besides
9 yourself?
10 A. The regional DON, the IT manager. I
11 have three administrative assistants, but
12 they're all working from home, working remote at
13 this current time.
14 Q. Because of the coronavirus?
15 A. Yes, sir.
16 Q. Where are you from? Where's your home?
17 A. I live in Richton, Mississippi, but I'm
18 from Beaumont, Mississippi, which is about
19 18 miles apart.
20 Q. I'm sorry. From where? Houma?
21 A. Richton, Mississippi, is where I live
22 currently, but I'm from Beaumont, Mississippi,
23 originally, Perry County.
24 Q. Okay. Thank you, ma'am.
25 What is your job with MHM Health

1 you give high quality of care to the prisoners?
2 A. Are you asking if that's spelled out in
3 the contract or --
4 Q. Well, I've looked at the contract and
5 don't really see anything regarding that; it may
6 be in there. But I'm just talking about any
7 company policies. If you know about it in the
8 contract, you can answer that. Is there
9 anything there in company policy that says that
10 you're to provide as good a quality care and
11 medical care as you can? Is there anything like
12 that in your company policies?
13 A. I'm not familiar with anything directly
14 in the policy. I think it's understood that you
15 provide quality care.
16 Q. Do you understand there's a general
17 legal requirement to take -- to provide adequate
18 medical care to any prisoner with serious
19 medical needs? Do you understand that?
20 MR. LONG-DANIELS: Objection to form.
21 BY MR. WAIDE:
22 Q. Did you understand my question?
23 A. No, I didn't.
24 Q. All right. Just as a matter of general
25 knowledge, do you understand that any facility

1 receive it this morning, over 100 pages. And it
2 was pretty late in the morning, about maybe
3 10ish.

4 Q. Did you understand, though, that his
5 deposition was about the circumstances under
6 which Dr. Woods lost her job? Did you
7 understand that's what it concerned?

8 A. It had other things in it, so I don't
9 know if it was just about her losing her job. I
10 saw patient care was mentioned in the blob that
11 I read.

12 Q. You're talking about patient care? I
13 see.

14 well, first of all, do you know whether
15 or not Dr. Woods was concerned about patient
16 care?

17 A. I don't know how to answer that. I
18 would hope that she was concerned about patient
19 care.

20 Q. All right. Are you aware, at least,
21 from some e-mails that you're getting that she
22 was concerned about a lack of security at the
23 prison in Marshall County?

24 A. To my knowledge --

25 MR. LONG-DANIELS: Objection to form.

1 A. To my knowledge -- to my knowledge, I
2 only recall one e-mail that was sent to me, and
3 it was not by Dr. Woods; it was sent by Hunter
4 Williamson.

5 BY MR. WAIDE:

6 Q. By Hunter Williams? Williamson?

7 A. Yes.

8 Q. All right. Mr. Williamson had worked
9 for y'all as -- was he a registered nurse? Am I
10 correct about that?

11 A. He was the health service
12 administrator.

13 Q. And he had expressed some concern about
14 what?

15 A. He sent one e-mail that there was low
16 security at Marshall County on one particular
17 night, and he had talked with the warden about
18 that. It was sent to me basically for
19 need-to-know information.

20 Q. Well, am I correct that, in order for a
21 patient to see a physician, there has to be
22 security? Correct?

23 A. That's correct.

24 Q. So a concern about security would also
25 impact patient care, would it not?

15

1 MR. LONG-DANIELS: Object to the
2 form.

3 You can answer.

4 A. The particular e-mail that I received
5 spoke on night shift. It did not concern day
6 shift. There is usually no doctors there at
7 night to see patients.

8 BY MR. WAIDE:

9 Q. Here's my question. This is just a
10 general question. Since you have to have
11 security in order for an inmate to see a doctor,
12 then a lack of security would impact patient
13 care, would it not?

14 MR. LONG-DANIELS: Objection to form.

15 A. Yes. If you have a lack of security,
16 it could impact patient care.

17 BY MR. WAIDE:

18 Q. All right. So -- now, you have -- your
19 company has a separate contract with a
20 company -- I mean with the state from the
21 company that's running the prison facility.
22 Right? Y'all have separate contracts with the
23 state?

24 A. Yes.

25 Q. As vice president of operations, would

16

1 you be the people -- would you be the -- strike
2 that.

3 who would be the person that would deal
4 with the -- with the prison authorities, the
5 people running the jail? Would that be you, or
6 would that be somebody else?

7 A. At the facility level, it would be the
8 HSA.

9 Q. All right. So do you agree with me
10 that, in taking care of the medical needs of
11 prisoners, that it would be your company's duty
12 to notify the prison authorities if they thought
13 there was inadequate security there?

14 A. Yes.

15 MR. LONG-DANIELS: Objection to form.

16 A. By the chain of command.

17 BY MR. WAIDE:

18 Q. All right. At any point -- well, you
19 say the HSA. Would it be the HSA on the scene
20 that should notify the prison authorities of the
21 lack of security, or would that be you? who
22 should do that?

23 A. That would be the HSA at the facility.

24 Q. All right. I think the HSA while
25 Dr. Woods was employed was Travis Day. Correct?

1 A. It was Hunter Williamson and then
 2 followed by Travis Day.
 3 Q. All right. Let's stop.
 4 To your knowledge, do you know whether
 5 or not Travis Day ever expressed any concerns
 6 about the lack of security to the prison
 7 authorities?
 8 A. To my knowledge, no.
 9 Q. And you say you think Hunter Williamson
 10 did on one occasion?
 11 A. Hunter Williamson sent an e-mail -- my
 12 testimony is he sent an e-mail to me that there
 13 was a lack of security at night that -- followed
 14 by a pill pass, and that he would be speaking
 15 with warden Williams concerning that incident.
 16 Q. What do you know as the vice president
 17 of operations -- what do you know, what do you
 18 have knowledge of that your company has done to
 19 try to assure that there was enough security
 20 there to see to it that the doctors were able to
 21 see patients so as to treat their serious
 22 medical needs? What has your company done to
 23 assure that that be done?
 24 MR. LONG-DANIELS: Objection to form.
 25 A. That would be related to the HSA at the

1 would be an issue that you would be concerned
 2 about. Correct?
 3 MR. LONG-DANIELS: Objection to form.
 4 A. Yes. I would be -- I would be
 5 concerned if there was not enough security.
 6 BY MR. WAIDE:
 7 Q. Other than the -- and the reason you'd
 8 be concerned is because that would impact the
 9 ability of your company to take care of the
 10 serious medical needs of prisoners. Correct?
 11 That's the reason you'd be concerned?
 12 MR. LONG-DANIELS: Objection to form.
 13 Same objection.
 14 BY MR. WAIDE:
 15 Q. Am I correct?
 16 A. Correct.
 17 Q. And to your knowledge, the only time
 18 you were ever notified or anytime your HSA ever
 19 made an issue out of a lack of security so that
 20 the prisoners could be brought for medical care
 21 was one e-mail by a former HSA, Mr. Williamson.
 22 Am I correct?
 23 A. To my recollection, yes.
 24 Q. All right. You said that you saw --
 25 you believe you saw the deposition or some of

1 facility. If there were some issues or
 2 concerns, they would report that to the warden
 3 or security; and if that wasn't handled, then it
 4 would fall to me. To my knowledge, to date I
 5 have not had anything to fall to me related to
 6 no security at that facility during Travis Day's
 7 time. The only time I have is Hunter
 8 Williamson's e-mail.
 9 BY MR. WAIDE:
 10 Q. You were not -- are you saying that you
 11 were not -- whoever the HSA was at the relevant
 12 time, whoever it was never did tell you that
 13 there was a shortage of security so that there
 14 was a problem in patients coming to their
 15 appointments? Nobody ever notified you of that?
 16 A. No. There was no notification of
 17 problems or concerns. There were notification
 18 of plans in the event that security was
 19 jeopardized and us not having security in the
 20 facilities.
 21 Q. Well, first of all, you agree with me
 22 that, if there's a lack of security -- if that
 23 exists, there's not enough security officers so
 24 that they can't bring the patients over to see
 25 the doctors, I think you agree with me that that

1 the deposition of warden Williams?
 2 A. What I stated was I received it this
 3 morning, and I haven't had time to go through
 4 it. I have glimpsed it. I did see his name,
 5 warden Williams' name, and some questions being
 6 answered. I can't tell you exactly what was
 7 asked. I just remember skimming it because I
 8 received it the latter part of the morning at
 9 10:00.
 10 Q. Do you know -- do you know whether or
 11 not he stated or he testified in that
 12 deposition -- from what you remember, do you
 13 remember whether or not he testified in there
 14 about a shortage of security and inability to
 15 get security officers up there?
 16 A. No, I don't recall that.
 17 Q. Do you know, as vice president of
 18 operations, whether there was -- in the spring
 19 of 2019 there was a shortage of security
 20 officers so that there weren't enough security
 21 officers sometimes to be able to take the
 22 prisoners over to see the doctors? Are you
 23 aware of that?
 24 MR. LONG-DANIELS: Objection to form.
 25 A. No, I'm not aware of that.

1 A. She's with the office of medical
2 compliance. She is our next go-to, Centurion
3 being the vendor. She's over the medical
4 contract for the state of Mississippi.

5 Q. So that's an option that Centurion has.
6 If they're not satisfied with the way things are
7 being run in the prison, that prisoners, for
8 example, aren't getting back to be seen, you can
9 go to the Mississippi Department of Corrections
10 or the Dr. Perry that you just mentioned?

11 A. Yes.

12 Q. Did you ever have to do that between,
13 let's say, March and June 2019?

14 A. I can't truthfully say. That's been
15 over a -- I mean, that's been a little while.
16 So I would say, if there was an issue that
17 arises, yes. I have the same protocol
18 regardless. I do report that, but I don't know
19 with that date frame --

20 Q. Sure.

21 A. -- who all I spoke to during that date
22 frame.

23 Q. You just don't remember one way or the
24 other?

25 A. I don't remember, yeah. But if it

1 out for some reason. Yes. The way it -- it
2 raised some red flags because of the way it was
3 written. And when he said it caused him a great
4 alarm because in the warden meeting he made
5 reference to a state rep driving through the
6 parking lot. So those were just the key -- the
7 nuggets that I pulled out, and I forwarded that
8 on to our HR business partner.

9 Q. Right. And what are the red flags?
10 That's a term you used. What red flags went off
11 in your mind when you saw that e-mail?

12 A. I thought chain of command immediately,
13 but what I saw was he's making reference that he
14 sat in a meeting the day before and that
15 Dr. Woods was at the nurse's station and she
16 mentioned she had conversation with a state rep
17 who lived in Marshall County, something going
18 on; and then further when he stated that there
19 was -- she also stated former Deputy Warden Doty
20 used to be at odds because she would call the
21 state rep about things that went on at Marshall
22 County when Doty was there. Those were the
23 things that kind of raised red flags to me, so
24 that's why I forwarded it on to the HR business
25 partner.

1 happened, I'm sure I would have reached out.

2 Q. Okay. Do you remember any concerns
3 raised by Dr. Woods or Travis Day that would
4 have led you to take that kind of step?

5 A. No. Yeah, I don't recall anything
6 being brought to me by Dr. Woods. I don't
7 recall anything being brought to me by Travis
8 Day related to something I needed to elevate
9 through the DOC.

10 Q. And you mentioned the term "chain of
11 command" when Mr. Waide was asking you
12 questions. Is that something that Centurion
13 relies upon, the chain of command?

14 A. Absolutely.

15 Q. And does Centurion expect its employees
16 to follow the chain of command?

17 A. Absolutely.

18 Q. You said, when you received this e-mail
19 that's marked as Exhibit 35 -- it's the e-mail
20 from Travis, the June 18, 2019, e-mail --

21 A. Yes.

22 Q. -- I think you said that raised some
23 red flags for you.

24 A. Yes. And I could have been traveling.
25 I'm trying to find it now because I just took it

1 Q. Right. And you wanted Ms. Huff and her
2 department to get involved as well, I assume?

3 A. Usually when I send her stuff, it's
4 just a FYI just in case something comes of it,
5 not so much as far as an investigation, just
6 basically that these are some allegations that
7 have been raised. And shortly thereafter -- I
8 don't know if I was traveling, because I don't
9 remember that block of time. I think he alluded
10 that it was seven days before or six days before
11 the clearance was pulled. I don't have anything
12 for that block.

13 Q. Right. And I haven't seen any e-mails
14 either, and I think you've said you don't recall
15 any as we sit here during that week period, give
16 or take.

17 A. Right.

18 Q. Do you recall during the -- between the
19 time you received Hunter's e-mail and the time
20 that you received the notification that the
21 clearance had been pulled, do you recall
22 speaking to Travis about the e-mail or the
23 situation?

24 A. I believe Travis called me, and he
25 verbally stated all these things and said that